

BOSTON EDISON

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BECO Ltr. 90- 127

U.S. Nuclear Regulatory Commission
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SUBMITTAL OF REVISED INSERVICE TESTING PROGRAM

This letter transmits our revised Inservice Testing Program (IST) which incorporates responses to NRC review questions and comments. In addition, other minor changes to the program have been identified as part of our IST procedure upgrade and have been incorporated into this revision. These changes are identified in the IST Program (PNPS 8.I.1.1) Revision Log.

In a July 20, 1990 NRC letter to Boston Edison Company (BECO), Mechanical Engineering Branch (MEB) commented on our January 4, 1990 submittal of our IST Program. A meeting was held on August 7, 1990 between BECO and MEB to discuss and resolve these comments. As a result of this meeting and subsequent conversations with members of your staff, we have prepared a revision to our IST Program (PNPS 8.I.1.1). Attachment 1 lists a summary of IST Program Relief Request changes and BECO response to NRC review questions and comments identified within the July 20, 1990 letter. Attachment 2 is our revised IST Program which supercedes our previous program submittal.

Due to changes made as a result of our program revision, procedure changes need to be implemented. This work has impacted scheduled commitments for upgrade of valve leakage and Refueling Outage procedures made in BECO Letter 89.158 dated October 27, 1989. We will complete these valve leakage and Refueling Outage procedures by 3/30/91. New procedure changes required by this Program Revision will be completed within 2 months of our receipt of the NRC Safety Evaluation Report. All other scheduled commitments of letter 89.158 remain unchanged.

It is our understanding that submittal of our revised program on or before October 29, 1990, will support NRC's review and issuance of an SER by December 1990.

R. G. Bird
for R. G. Bird

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BOSTON EDISON COMPANY

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Page 2

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SUMMARY OF IST PROGRAM RELIEF REQUEST CHANGES AND
PROPOSED BECO RESPONSE TO NRC REVIEW QUESTIONS AND COMMENTS

- RP-1 Acceptance ranges for the RBCCW Pumps will be established and controlled IAW the guidelines provided within the PNPS IST Program. Reference to differential pressure High Limits have been removed from this Relief Request.
- RP-3 The same basic test method for SBLC Pumps has been used for a number of years. Recently instituted procedural controls assure good repeatability. Clarification of the test method used and a reference to repeatability has been added to the Relief Request.
- RP-5 Acceptance ranges for the SSW Pumps will be established and controlled IAW the guidelines provided within the PNPS IST Program. Reference to differential pressure High Limits have been removed from this Relief Request.
- RP-7 Provided additional information within the Basis section.
- RP-9 Clarification changes and statements have been incorporated into this Relief Request.
- RP-10 The inclusion of this skid-mounted pump within the IST Program has been reevaluated by BECO and removed from the IST Program. This Relief Request has been retracted.
- RV-03 References to IWV-3300, Position Indication Verification, have been deleted.
- RV-09 Added description of method being used to verify the 115 valve closed (Alternate Position Check). Added statement that specifies Alternate Testing requirement for the 115 valve.
- RV-11 Added discussion on fail-safe testing in Basis and Alternate Testing sections. Provide additional information within Basis for not measuring valve stroke times.
- RV-16 Clarified existing RCIC Governor Valve number by adding "(HYD-1301-159)".
- RV-17 Review by Engineering and RS&PD indicates valves should remain within IST Program. BECO requests review and approval of this Relief Request.
- RV-18 Added information concerning inability of MSIVs to open, if Accumulator Supply Check Valve fails to open.
- RV-20 Added information concerning modifications to be made during RFO #8 and a statement concerning Reverse Flow Closure Testing (Alternate Position Check) for these valves.

ATTACHMENT 1

- RV-21 Provided additional information to Basis and Alternate Testing sections. Included justification for not performing exercise during cold shutdowns.
- RV-23 Added "full load" to clarify that Alternate Testing equals the design accident flow for these valves.
- RV-24 The Head Spray Valves listed in RV-24 are valves that require removal of the Drywell (containment) head and an RHR pipe spool that connects to the reactor vessel head for testing. Therefore, this relief must be tied into Refuel activities due to the impracticality, hardship and radiation exposure involved with removing these components. Additional clarification and reference to Refuel activities have been added to the Basis of this Relief Request.
- RV-25 Revised Basis section to more accurately describe valve characteristics that prevent stroke time measurement.
- RV-27 Added the specific valve numbers that require relief.
- RV-29 Reworded Basis and Alternate Testing sections to provide more justification and additional clarity.
- RV-30 This Relief was clarified by adding a statement concerning applicability within the Basis.